

1 REMARKS

2 Applicant has carefully considered the positions of the Examiner, and respectfully requests
3 reconsideration based upon the manifest differences between the present invention and the cited
4 references. In the Office Action dated August 12, 2003, the Examiner rejected Claims 21-40 under 35
5 U.S.C. §§ 112 and/or 103. Applicant has amended the pending claims to more clearly define the novel
6 invention, and herein responds to these rejections.

7 Initially, applicant respectfully disagrees with the Examiner's §112 rejection of Claims 21-40 as
8 failing to comply with the written description requirement. In particular, applicant does not agree with
9 the Examiner's opinion that "[t]he claimed limitation of accessing said transaction community without
10 system enrollment cannot be found in the specification." Indeed, applicant directs the Examiner's
11 attention to p. 32, ln. 8 through p. 33, ln. 3 and p. 33, ln. 9 through p. 35, ln. 8 and Figures 2A & 2B
12 and the associated description on p. 51, ln.19 through p. 54, ln. 17 in applicant's originally filed
13 application. From these passages, it is abundantly clear that the specification does in fact reasonably
14 convey to one of skill in the art that the applicant had possession of the invention as claimed at the time
15 the application was filed. For instance, at p. 32, ln. 8 through p. 33, ln. 3 the applicant described how a
16 debtor may resolve debt by interacting with a "transaction community" through an Internet address URL
17 provided to him (i.e., without the need for enrolling in any system, downloading software, setting up an
18 account, etc.). Specifically, the specification states that "[t]he user [debtor] is invited to resolve debt
19 through direct mail correspondence from the collection agency [creditor]. This letter includes the
20 'transaction community' Internet address (URL) as well as a unique ID that allows users to view their
21 debt and enter a valid settlement. The credit or collection agency can consult with its clients to decide

1 which 'transaction community' would be appropriate to direct the client's customers toward." Similar
2 evidence is present throughout applicant's disclosure (see, e.g., p. 32, ln. 8 through p. 33, ln. 3; p. 33,
3 ln. 9 through p. 35, ln. 8; Figures 2A & 2B; and p. 51, ln.19 through p. 54, ln. 17). From these
4 passages in the applicant's original specification, it is readily apparent that applicant had possession of
5 the limitation requiring the accessing of a "transaction community" without system enrollment.
6 Nonetheless, applicant has taken the Examiner's suggestion to amend the claims to further clarify that
7 neither the debtor nor the creditor (i.e., biller) performs any system enrollment. Applicant thanks the
8 Examiner for this suggestion, and respectfully requests that this rejection be withdrawn.

9 Turning next to the Examiner's rejection of Claims 21-40 as being unpatentable over Lamm in
10 view of Remington *et al.*, in further view of Bednar *et al.*, Hilt *et al.* or Ziarno *et al.*, applicant
11 respectfully submits that the Examiner has mistakenly assumed enrollment by the creditor (biller) in the
12 claimed system despite the existing limitation of "without system enrollment". This is not the applicant's
13 invention, and applicant has amended the claims to highlight that there is no system enrollment by either
14 the creditor (biller) or the debtor in the claimed system.

15 According to the present claimed invention, a system and method for the presentment and
16 resolution of a debt is provided in which a debtor is armed with an authorization code that is used to
17 gain access to a "transaction community" which allows for the exchange of information between a
18 debtor and a creditor to aid in the resolution of debt without the burdens of downloads, set-up,
19 registration and/or enrollment by either the debtor or creditor.

20 By way of example, in the present claimed system, a debtor may be provided with notice of a
21 debt from a creditor. In such a notice, the debtor will be given an authorization code and an Internet

1 address URL link to the system's "transaction community". By entering the Internet address URL link
2 on a typical web browser, the debtor may access the "transaction community" by simply entering the
3 authorization code provided on the debt notice. Entry of the particular authorization code signals the
4 claimed system that the transaction to be performed by the debtor is to be handled using a
5 predetermined set of "business rules" established for that particular authorization code. The debtor may
6 then be provided with a number of options regarding the specific debt (i.e., to resolve the debt, to
7 inquire about the debt, to challenge the validity of the debt, etc.). Of course, the debtor is also assigned
8 a password, customer ID, or account number by the creditor (biller) (which is not previously known to
9 the claimed system) in order that the payment may be connected or properly allocated as payment for
10 the appropriate debt. Importantly, the authorization codes according to the claimed system are
11 established on an account pool basis rather than on an account specific setup. Such a novel method
12 and system drives the efficiency and utility of the claimed system as compared to previous systems.

13 That is, in previous systems, including the systems disclosed in the cited references, each
14 account is individually set up in the system on a specific account basis, either by the debtor or the
15 creditor (biller), and therefore account specific information must be loaded, stored, and updated within
16 the system to await authentication and payment by debtors. In contradistinction, the claimed method
17 and system eliminates the burdens of account loading / enrollment, storing and updating account specific
18 information within the system by instead cleverly authenticating an individual transaction on an account
19 pool basis, and thereby significantly reduces the time consuming and expensive burdens of the previous
20 systems. No system enrollment or account specific setup by the debtor or creditor is needed -- the
21 authorization code entered by the debtor tells the system that the transaction to be performed belongs

1 to an account pool for which a certain set of predetermined "business rules" apply. The system may
2 then process, fund and report the transaction based on the applicable set of "business rules". The debt
3 presentment and resolution system and method of the claimed invention is significantly different than
4 those disclosed in the cited references.

5 As previously argued, the system according to Lamm requires the debtor to enroll in the system
6 by downloading a set-up program, downloading a software program and enrolling with the billing party
7 -- all very tedious and sometimes confusing steps. As the Examiner points out, the system according to
8 Remington requires the creditor (or biller) to undertake the burdensome account specific setup and
9 enrollment process. Nowhere do Lamm or Remington teach or suggest a system or method for
10 presenting and resolving a debt where the debtor's/creditor's burden of individual account specific set-
11 up, registration and enrollment are eliminated -- i.e., like the present invention. Similarly, none of
12 Bednar, Hilt and Ziarno disclose a bill presentment and resolution system which does not require
13 enrollment by at least one of the debtor and creditor.

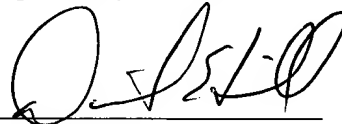
14 Furthermore, even combining Lamm with any of the other cited references, if proper, does not
15 teach or suggest applicant's novel invention. That is, as discussed above, Lamm, Remington, Bednar,
16 Hilt and Ziarno all fail to disclose a system and method for debt presentment which does not require a
17 debtor and/or creditor to download, set-up, register and enroll on an account specific basis.
18 Moreover, the claimed system has proven in practice to be new and non-obvious to payment system
19 professionals at large payment volume billers during numerous system implementations.

20 Therefore, as is evidenced by the above amendments and remarks, the present invention, for
21 the first time, discloses a system and method for debt presentment and resolution that relieves the

1 debtors and creditors of the burdens of enrollment, registration, and/or account set-up by providing an
2 authorization code and an Internet address URL to the debtor and creditor to use to access a
3 "transaction community" for presentment and resolution of a debt. A system and method such as this is
4 neither taught nor suggested anywhere in the prior art, including Lamm, Remington, Bednar, Hilt, and/or
5 Ziarno. Upon closer review of the cited references, in view of the amendments and remarks made
6 herein above, applicant submits that the Examiner's rejection of Claim 21-40 have been overcome, and
7 should be reconsidered and withdrawn.

8 In view of the foregoing, applicant respectfully submits that the present invention represents a
9 patentable contribution to the art and the application is in condition for allowance. Early and favorable
10 action is accordingly solicited.

Respectfully submitted,



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Dated: February 12, 2004